

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**JOINT TEMPORARY SEALING  
MOTION REGARDING DKT. NO.  
1305 (JOINT LETTER BRIEF ON  
PLAINTIFFS' RFP NOS. 62, 69, 71, 72,  
76, and 79)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs and Defendants file this Joint Temporary Sealing Motion regarding the Parties' Joint Letter Brief on Plaintiffs' RFP Nos. 62, 69, 71, 72, 76, and 79. Pursuant to that Order, the reasons for sealing will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Dkt. No.	Description	Designating Party
1305	Joint Letter Brief	YouTube

Respectfully submitted,

DATED: November 5, 2024

**WILSON SONSINI GOODRICH & ROSATI**

Professional Corporation

By: /s/ Christopher Chiou

Brian M. Willen (*pro hac vice*)

**WILSON SONSINI GOODRICH & ROSATI PC**

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Telephone: (212) 999-5800

Facsimile: (212) 999-5899

Email: bwillen@wsgr.com

Lauren Gallo White (State Bar No. 309075)

Samantha A. Machock (State Bar No. 298852)

**WILSON SONSINI GOODRICH & ROSATI PC**

One Market Plaza, Spear Tower, Suite 3300

San Francisco, CA 94105

Telephone: (415) 947-2000

Facsimile: (415) 947-2099

Email: lwhite@wsgr.com

Email: smachock@wsgr.com

Christopher Chiou (State Bar No. 233587)

Matthew K. Donohue (State Bar No. 302144)

**WILSON SONSINI GOODRICH & ROSATI PC**

953 East Third Street, Suite 100

Los Angeles, CA 90013

Telephone: (323) 210-2900

Facsimile: (866) 974-7329

Email: cchiou@wsgr.com

Email: mdonohue@wsgr.com

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

DATED: November 5, 2024

By: /s/ Lexi J. Hazam

LEXI J. HAZAM

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

275 Battery Street, 29<sup>th</sup> Floor

San Francisco, CA 94111-3339

Telephone: 415-956-1000

lhazam@lchb.com

PREVIN WARREN

**MOTLEY RICE LLC**

401 9th Street NW Suite 630

Washington DC 20004

Telephone: 202-386-9610

pwarren@motleyrice.com

Co-Lead Counsel

1 CHRISTOPHER A. SEEGER  
2 **SEEGER WEISS, LLP**  
3 55 Challenger Road, 6<sup>th</sup> floor  
4 Ridgefield Park, NJ 07660  
5 Telephone: 973-639-9100  
6 Facsimile: 973-679-8656  
7 cseeger@seegerweiss.com

8 Counsel to Co-Lead Counsel and Settlement  
9 Counsel

10 JENNIE LEE ANDERSON  
11 **ANDRUS ANDERSON, LLP**  
12 155 Montgomery Street, Suite 900  
13 San Francisco, CA 94104  
14 Telephone: 415-986-1400  
15 jennie@andrusanderson.com

16 Liaison Counsel

17 JOSEPH G. VANZANDT  
18 **BEASLEY ALLEN CROW METHVIN**  
19 **PORTIS & MILES, P.C.**  
20 234 Commerce Street  
21 Montgomery, AL 36103  
22 Telephone: 334-269-2343  
23 joseph.vanzandt@beasleyallen.com

24 EMILY C. JEFFCOTT  
25 **MORGAN & MORGAN**  
26 220 W. Garden Street, 9<sup>th</sup> Floor  
27 Pensacola, FL 32502  
28 Telephone: 850-316-9100  
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
jbilsborrow@weitzlux.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 Madison Ave, 7<sup>th</sup> Floor

1 New York, NY 10016  
2 Telephone: 917-882-5522  
jconroy@simmonsfirm.com

3 ANDRE MURA  
4 **GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
5 Telephone: 510-350-9717  
amm@classlawgroup.com

6 ALEXANDRA WALSH  
7 **WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
8 Washington D.C. 20036  
Telephone: 202-780-3014  
9 awalsh@alexwalshlaw.com

10 MICHAEL M. WEINKOWITZ  
11 **LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street Suite 500  
Philadelphia, PA 19106  
12 Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

13 Plaintiffs' Steering Committee Leadership

14 RON AUSTIN  
15 **RON AUSTIN LAW**  
400 MANHATTAN BLVD  
16 HARVEY, LA 70058  
Telephone: 504-227-8100  
17 raustin@ronaustinlaw.com

18 PAIGE BOLDT  
19 **WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
20 Telephone: 210-448-0500  
PBoldt@WattsGuerra.com

21 THOMAS P. CARTMELL  
22 **WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
23 Kansas City, MO 64112  
Telephone: 816-701 1100  
24 tcartmell@wcllp.com

25 SARAH EMERY  
26 **HENDY JOHNSON VAUGHN EMERY, PSC**  
2380 Grandview Drive  
Ft. Mitchell, KY 41017  
27 Telephone: 888-606-5297  
semery@justicestartshere.com

28 CARRIE GOLDBERG

1 **C.A. GOLDBERG, PLLC**  
16 Court St.  
2 Brooklyn, NY 11241  
Telephone: (646) 666-8908  
3 carrie@cagoldberglaw.com

4 RONALD E. JOHNSON, JR.  
5 **HENDY JOHNSON VAUGHN EMERY, PSC**  
600 West Main Street, Suite 100  
Louisville, KY 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

7 SIN-TING MARY LIU  
8 **AYLSTOCK WITKIN KREIS &**  
9 **OVERHOLTZ, PLLC**  
10 17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

11 JAMES MARSH  
12 **MARSH LAW FIRM PLLC**  
13 31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

14 HILLARY NAPPI  
15 **HACH & ROSE LLP**  
16 112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

17 EMMIE PAULOS  
18 **LEVIN PAPANTONIO RAFFERTY**  
19 316 South Baylen Street, Suite 600  
20 Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

21 RUTH THI RIZKALLA  
22 **THE CARLSON LAW FIRM, P.C.**  
23 1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

24 ROLAND TELLIS  
25 DAVID FERNANDES  
26 **BARON & BUDD, P.C.**  
27 15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333

Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

MELISSA YEATES  
JOSEPH E. MELTZER  
**KESSLER TOPAZ MELTZER & CHECK, LLP**  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

DIANDRA "FU" DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20<sup>th</sup> St North Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellolevitt.com

Plaintiffs' Steering Committee Membership

*Attorneys for Plaintiffs*

**ATTESTATION**

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 5, 2024

By: /s/ Christopher Chiou  
Christopher Chiou